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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA – MODESTO DIVISION

In re:

WAFA Y. QASSIM

Debtor.

Case No: 10-90688-E-7
DCN: JDP-1

Chapter 7

Date: April 21, 2010

Time: 10:30 am

Place: 1200 I Street, Suite 4, Modesto, CA

MOTION TO COMPEL CHAPTER 7 TRUSTEE
TO ABANDON PROPERTY OF THE ESTATE

TO THE HONORABLE RONALD H. SARGIS, STEPHEN C. FERLMANN/CHAPTER 7
TRUSTEE, AND ALL OTHER INTERESTED PARTIES:

Wafa Qassim (“Debtor”) hereby moves this Court for an Order Granting Debtor’s MOTION TO COMPEL CHAPTER 7 TRUSTEE TO ABANDON PROPERTY OF THE ESTATE based upon the following grounds:

1. Debtor filed a Chapter 7 bankruptcy case, bearing the case number 10-90688-E-7 on February 26, 2010.
2. Debtor owns and operates a small convenient store business named “Cigarettes Fresh & More.” A true and correct copy of Schedule B of the Debtor’s Voluntary Petition is filed concurrently herewith as Exhibit “A” and incorporated herein by reference. This business has no marketable value outside Debtor’s own efforts. The bank accounts and inventory needed to operate the business are listed and exempted on Schedules B and C of debtor’s petition. This

1 business is the Debtor's main occupation at the present time. The Debtor has invested
2 substantial resources, time, and energy into this business and, because of the investment,
3 wishes to keep operating at the present time. If the Debtor ceases operations, even for a short
4 time, she will surely lose clientele, making it impossible to reopen and maintain its required
5 expenses.

- 6 3. The convenient store business listed herein and operated by the Debtor, including the bank
7 accounts and inventory, have a liquidation value of approximately \$9,500, which is fully
8 exempt under various sections of the California Code of Civil Procedure. A true and correct
9 copy of Schedule C of the Debtor's Voluntary Petition is filed concurrently herewith as
10 Exhibit "B" and incorporated herein by reference.
- 11 4. The equity in Property is exempted pursuant to C.C.P. Sections 703.140(b)(5) and (6) as set
12 forth in Debtor's Schedule C filed concurrently herewith in the List of Exhibits.
- 13 5. As the Property is protected and exempted, it is of inconsequential value to the bankruptcy
14 estate, and there is nothing for the Trustee to administer to unsecured creditors.

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17 DATED: March 23, 2010

/s/ James D. Pitner
James D. Pitner
Attorney for Debtor